

received m/s
Jan 17, 1983

LINES OF INQUIRY

I. Inter Company Information

Background: ARRCOM related companies include:

ARRCOM, Inc.
Empire Oil Company, Inc.
U.S. Refineries, Inc.
Golden Penn, Inc. (Q.E.D. Inc.; QED Corporation)
Golden Penn Oil Company of Seattle
Western Pacific Vacuum Service
Terry Drexler Inc.
Drexler Enterprises, Inc.
TADCO
WADCO

Inquiries:

- What additional companies, if any, were associated with ARRCOM, Inc., or the Drexler family?
- With what additional companies did the Drexlers serve as officers, directors?
- Explain generally the inter-relationships between the companies; specifically:
 - For what purpose did the Drexlers create the several companies; i.e., why not a single or fewer companies?
 - Which corporate officers of the Drexler companies are currently engaged in any business involving oil; specifically waste oil recycling and reprocessing?
 - Which corporate officers are involved today with other related business enterprises?

II: ARRCOM Rathdrum Site

Inquiries:

- Describe generally the oil processing business carried on at the Rathdrum Site.
- Describe specifically the business practices that resulted in contamination at the site; i.e., leaks, spills, intentional dumping, etc.
- What are the names of the sources from which ARRCOM acquired products for processing? Are any of these companies currently in business?
- How was the product carried to the site; i.e., railroad car, tanker truck, barrels, etc.?



- What are the names of the transporters of oils and solvents to the site?
- Were products shipped between ARECOM related companies? If so, provide details.
- Was the Rathdrum site involved in any way with the marine tanker cleaning, operated primarily at the Woodman site?
- How were the incoming oils and solvents accounted for; i.e., What business records such as invoices, receipts, weight tickets, bill of lading etc., were involved in the transaction?
- Where would any such documents be located today?
- What individuals other than yourself, inside or outside the ARECOM organization, are knowledgeable of the areas discussed above?
- Had any creditors or other outside sources been provided any of the information requested above; i.e., were banks notified of accounts receivable that might identify sources or transporters of product to the Rathdrum site.

III. Personnel

Background: Officers and directors of ARECOM related companies include: (see INTER COMPANY BACKGROUND INFORMATION)

- ARECOM:
 - George W. Drexler
 - David G. Drexler
 - Hazel M. Drexler
 - Thomas A. Drexler
 - Atle N. Foss
- EMPIRE OIL COMPANY:
 - Frank Valela
 - Joe Valela
- U.S. REFINERIES, INC.:
 - John Wolfe
 - C.L. Wolfe
 - L. McCoy
- GOLDEN PENN:
 - Ward Roberts
 - Wally (George) Drexler
 - T.E. Moriarty
 - William S. Kemp
 - G.W. Drexler

- GOLDEN PENN:

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- G.W. Drexler
- W.W. Roberts

Inquiries:

- Specifically describe the involvement of these individuals in the management and operation of the related businesses.
- Which individuals are knowledgeable of the existence of ARRCOM related companies today?
- Which individuals are knowledgeable of business practices at the Rathdrum site?
- Which individuals are knowledgeable of generators and transporters of oils and solvents to the Rathdrum site.
- Which individuals are knowledgeable of existence and location of business records that might identify generators and transporters of products to the Rathdrum site.

IV. Rathdrum Site (Property Interests)

Background:

Persons identified with an interest in the Rathdrum property include:

Warren Bingham
Frank M. Bundy
Alan Pickett
George Drexler (ARRCOM)
Jimmie Allen Peterson

Inquiries:

- Explain the association of the above named individuals with the ownership and or operation of the Rathdrum site.
- To what extent were these individually involved with the oversight or management of activities at the site?
- To what extent do the (individually) retain any interest in the property?

V. Generators/Transporters

Background:

Halverwood Company (Montana), United Coatings (Spokane, WA), and Anaconda Aluminum (Montana), are known to have shipped waste oils and solvents to the Rathdrum site.

Inquiries:

Specifically, what shipments were made to the Rathdrum site; over what time periods and how were the solvents and oils transported?

What other companies sold or shipped waste oils and solvents to the Rathdrum site?